

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO ETHICON NON-REVISION PTO 298 (ELECTION WAVE) CASES</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**NOTICE OF ADOPTION OF PRIOR RESPONSES IN OPPOSITION TO PLAINTIFFS’  
MOTION TO EXCLUDE THE TESTIMONY OF MICHAEL KARRAM, M.D. FOR  
NON-REVISION PTO 298 (ELECTION WAVE)**

Defendants Ethicon, Inc. and Johnson & Johnson (collectively, “Ethicon”) submit this notice in response to Plaintiffs’ Notice of Adoption of Prior *Daubert* Motion of Michael Karram, M.D. for Non-Revision PTO 298 (Election Wave), Doc. 7291. In their Notice of Adoption, Plaintiffs adopt and incorporate their *Daubert* motions filed against Michael Karram for Ethicon Waves 1, 2 and 3. *See* Dkt. 2091, 2446, and 2849 (motions) & Dkt. 2092, 2471, and 2851 (memoranda in support).<sup>1</sup> Ethicon hereby adopts and incorporates by reference its Responses to Plaintiffs’ *Daubert* motions filed against Michael Karram, M.D., in Waves 1, 2, 3 and 4. Dkt. 2133, 2424, 2951, and 3785. This response applies to the Non-Revision PTO 298 Election Wave cases identified in Exhibit A to Plaintiffs’ Notice of Adoption.

---

<sup>1</sup> On August March 29, 2017, this Court issued a Memorandum Opinion and Order on Plaintiffs’ Wave 2 Motion to Exclude the Expert Testimony of Michael Karram, M.D. [ECF No. 2446], Dkt. 3542 (Opinion and Order), which was adopted for the Wave 3 cases on July 20, 2017, for Wave 4 on July 23, 2018, for Wave 5 on July 26, 2018, and for Wave 6 on July 27, 2018, Dkt. 4174, 6287, 6356, and 6416 (respective Orders Adopting).

Respectfully submitted,

/s/ William M. Gage

William M. Gage (MS Bar #8691)

Butler Snow LLP

1020 Highland Colony Parkway

Suite 1400 (39157)

P.O. Box 6010

Ridgeland, MS 39158-6010

(601) 985-4561

[william.gage@butlersnow.com](mailto:william.gage@butlersnow.com)

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar #5169)

Thomas Combs & Spann PLLC

300 Summers Street

Suite 1380 (25301)

P.O. Box 3824

Charleston, WV 24338

(304) 414-1800

[srobinson@tcspllc.com](mailto:srobinson@tcspllc.com)

Counsel for Defendants

Ethicon, Inc. and Johnson & Johnson

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO ETHICON NON-REVISION PTO 298 (ELECTION WAVE) CASES</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

CERTIFICATE OF SERVICE

I, William M. Gage, certify that on this date, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage  
William M. Gage (MS Bar #8691)  
Butler Snow LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4561  
[william.gage@butlersnow.com](mailto:william.gage@butlersnow.com)

39198626.v1